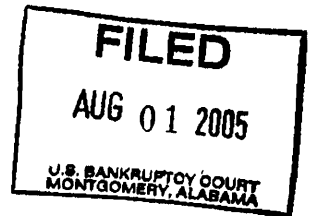


IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF ALABAMA



IN RE:

ATHEAL PIERCE,
Debtor.

CHAPTER No. 13
Case No. 05-31205

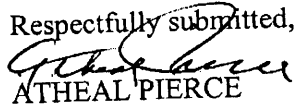
OBJECTION and RESPONSE
5901 Havenwood, Montgomery, Alabama

TO: The Honorable Dwight H. Williams, United States Bankruptcy Judge:

Comes Now your Debtor, Atheal Pierce and for good cause submits this objection and response as to the real property located at 5901 Havenwood Drive, Montgomery, Alabama, in reply to the motion to lift stay.

1. Debtor owns an undivided five (5) percent ownership of unit 5901 at Havenwood Drive, Montgomery, Alabama.
2. After confirmation of a plan, Debtor will properly proceed to ask the Honorable and presiding court official in this cause to reach a determinative value of said five percent.
3. Debtor is without information as to the co-owner's contract with American General Finance and/or Mr. Charles Parnell.
4. Mr. Charles Parnell knew or should have known that Debtor has not put before this honorable court any matters pertaining to unit 5901 beyond "broad claim disclosure" at page 2 of 2 in reference to 11 USC section 363(h) and 11 USC section 506.
3. The motion to lift stay is errant, prejudicial and not pleaded in good spirit.
4. Debtor is not aware of a confirmed plan as alleged by Mr. Parnell. Also, Debtor does dispute the pleadings of Mr. Parnell.

Wherefore, Debtor prays that the motion to lift stay be denied or grant an evidentiary hearing on the matter and grant Debtor that which is fair under the circumstances and assess litigation expenses in favor of your Debtor/Respondent as this Court deems proper.

Respectfully submitted,

ATHEAL PIERCE

112 Knollwood Blvd.
Montgomery, Alabama 36117

Certificate of Service

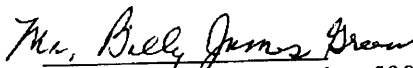

I hereby certify that I have mailed a copy of this pleading by U.S. mail, postage prepaid, to the following on this, the 1st day of August, 05.

Honorable Curtis C. Reding
Trustee
P.O. Box 173
Montgomery, Alabama 36101

Honorable Tresa Jacobs
Bankruptcy Court Administrator
One Church Street
Montgomery, Alabama 36104

Mr. Charles Parnell
P.O. Box 2189
Montgomery, Alabama 36102

Mr. Barry Ross
Havenwood Village, Inc. and
Havenwood Village Condominium Association, Inc.
124 North Haardt Drive
Montgomery, Alabama 36105r


Co-owner of Unit Number 5901
Havenwood Drive
Montgomery, Alabama 36117
A.P. 

MR. JAMES E. WALKER IV
P.O. Box 1682
Montgomery, AL 36102